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Special Counsel for Creditors,

CITIES OF ARCATA, BLUE LAKE, CHICO, CUPERTINO, DINUBA, MONTEREY,

ORANGE COVE, OROVILLE, PACIFIC GROVE, SACRAMENTO, SALINAS, SAN

LEANDRO, SANGER, SANTA CRUZ, SUNNYVALE, VALLEJO, WOODLAKE and

the COUNTY OF SACRAMENTO

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF MOTION FOR PAYMENT OF
ADMINISTRATIVE EXPENSE OR, IN THE
ALTERNATIVE, RELIEF FROM STAY OR
FROM DISCHARGE INJUNCTION TO
PERMIT PROCEEDINGS IN
NON-BANKRUPTCY FORUM**

Judge: Hon. Dennis Montali

Date: July 21, 2020

Time: 10:00 a.m.

Place: Telephonic Hearing (or via video,
where approved and applicable)

Objection Deadline:

July 16, 2020 at 4:00 p.m. (PT)

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

**All papers shall be filed in the Lead
Case, No. 19-30088 (DM)*

PLEASE TAKE NOTICE that on January 29, 2019 (the “Petition Date”), PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession (the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court will hold a hearing on July 21, 2020, at 10:00 a.m. (prevailing Pacific Time) (the “Omnibus Hearing”). The hearing will only be held telephonically (or via video, where approved and applicable). No in-person hearing will take place. All interested parties should consult the Bankruptcy Court’s website at www.canb.uscourts.gov for information about court operations during the COVID-19 pandemic. The Bankruptcy Court’s website provides information regarding how to arrange a telephonic or video appearance. If you have any questions regarding how to appear at a court hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court’s website.

PLEASE TAKE FURTHER NOTICE that, in addition to any other matters to be heard at the Omnibus Hearing, the Bankruptcy Court is scheduled to hear the Motion of

Arcata, Blue Lake, Chico, Cupertino, Dinuba, Monterey, Orange Cove, Oroville, Pacific Grove, Sacramento, Salinas, San Leandro, Sanger, Santa Cruz, Sunnyvale, Vallejo, Woodlake, and the County of Sacramento (collectively, “Cities”) from the Automatic Stay to Permit Proceedings in Non-Bankruptcy Forum to Continue (the “Motion”).

PLEASE TAKE FURTHER NOTICE that any oppositions or responses to the Motion must be in writing, filed with the Bankruptcy Court, and served on the counsel for the Cities at the above-referenced address so as to be received by no later than 4:00 p.m. (prevailing Pacific Time) on July 16, 2020. Any oppositions or responses must be filed and served on all “Standard Parties” as defined in, and in accordance with, the Second Amended Order Implementing Certain Notice and Case Management Procedures entered on May 14, 2019 [Docket No. 1996] (the “Case Management Order”). Any relief requested in the Motion may be granted without a hearing if no opposition is timely filed and served in accordance with the Case Management Order. In deciding the Motion, the

1 Court may consider any other document filed in these Chapter 11 Cases and related Adversary
2 Proceedings.

3 PLEASE TAKE FURTHER NOTICE that copies of the Motion and its supporting papers can
4 be viewed and/or obtained: (i) by accessing the Court's website at <http://www.canb.uscourts.gov>, (ii)
5 by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA
6 94102, or (iii) from the Debtors' notice and claims agent, Prime Clerk LLC , at
7 <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based
8 parties; or +1 (929) 333-8977 for International parties or by email at: pgeinfo@primeclerk.com.
9 Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

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11 DATED: June 28, 2020

**COLANTUONO, HIGHSMITH &
WHATLEY, PC**

/s/ John L. Jones II

MICHAEL G. COLANTUONO

JOHN L. JONES II

Creditors Cities of Arcata, Blue Lake, Chico,
Cupertino, Dinuba, Monterey, Orange Cove, Oroville,
Pacific Grove, Sacramento, Salinas, San Leandro,
Sanger, Santa Cruz, Sunnyvale, Vallejo, Woodlake and
the County of Sacramento